

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA)	
AND STATE OF TENNESSEE <i>ex rel.</i>)	
JEFFREY H. LIEBMAN AND)	
DAVID M. STERN, M.D.,)	Case No. 3:17-CV-902
)	
Plaintiffs/Relators,)	
)	
v.)	
)	Judge William L. Campbell, Jr.
METHODIST LE BONHEUR)	
HEALTHCARE, <i>et al.</i>,)	Magistrate Judge Barbara D.
)	Holmes
Defendants.)	
)	

WEST’S MOTION TO INTERVENE

The West Clinic, PLLC (“West”) respectfully moves for an Order granting West intervention in the above-captioned action under Fed. R. Civ. P. 24. As set forth more fully in the Memorandum of Law in Support of West’s Motion to Intervene, the Court should allow West to intervene as of right under Fed. R. Civ. P 24(a) because West’s Motion to Intervene is timely, West has a substantial legal interest in this action, West’s interest will be impaired absent intervention, and West’s interests are not adequately protected by the current parties. In the alternative, the Court should use its discretion to grant West permissive intervention under Fed. R. Civ. P 24(b) because West’s Motion to Intervene is timely, West shares a common defense to this action, and intervention would not cause undue delay or excessive prejudice to the current parties.

Dated this 22nd day of October, 2021.

Respectfully submitted,

/s/ John-David Thomas

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CERTIFICATE OF SERVICE

I hereby certify that on October 22, 2021, I emailed the Operations Manager to have electronically filed with the Clerk of the Court using the CM/ECF system and served the above via email upon:

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